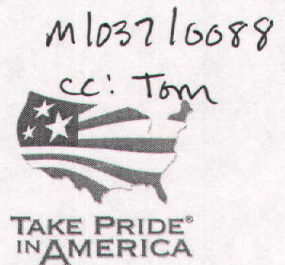




United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab Field Office
82 East Dogwood
Moab, Utah 84532



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DIV. OF OIL, GAS & MINING

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Mr. Lantz Indergard
Lisbon Valley Mining Company, LLC
755 North Main Street
Moab, Utah 84532

RE: Mine Plan Modification: New Haul Road from GTO Pit to Heap Leach Pad

Dear Mr. Indergard:

On November 4, 2010, the Bureau of Land Management (BLM) received Lisbon Valley Mining Company, LLC's "Proposed Design Revision for Mine Plan Amendment. Haul Road From GTO Pit".

We reviewed this mine plan modification per 43 CFR 3809.401 and 43 CFR 3809.431(a) and determined that the modification is not complete. For the BLM to finish processing Lisbon Valley's mine plan modification we will need the following information to provide more detail for the environmental analysis.

Technical Approach

- First line under this section: The plan modification says "*The technical approach involves stockpiling blasted rock from Centennial Pit.*" Please clarify what the method of stockpiling is. The BLM assumes, though it is not stated, that the material would be stockpiled as fill for the road base of the proposed haul road.
- Third sentence states "*A significant amount of this material will become available for reclamation/road base use as the highwall is mined back to an acceptable slope.*" What is the characterization of the overburden/waste rock that is going to be removed from the highwall and used in reclamation? It may be good quality (durable) for use in reclamation, but is it chemically suitable?
- Sentences four and five say: "*After several engineering iterations, LVMC has expanded the road design to reduce the grade and designed reclamation cover for the primary crusher wall. The calculated volume of rock for both is about 1.2 M cu yds.*" If 1.2 million cubic yards is needed as fill for the new road construction and to reclaim the crusher wall, how much of this 1.2 M is going to be used as

road fill and how much of it is going to be used to reclaim the crusher wall? Please provide the dimensions for the haul road (length and width) and dimensions for the crusher wall reclamation (length, width and depth). How much of the road currently exists?

- General information needed: Provide more detail on the reclamation of the crusher wall. Will it be graded to blend with the surrounding landscape, top-soiled and seeded?

Revised Design

- What aspect of this design will improve the storm water pollution protection?

Section 1 – Technical Description

- First paragraph, first sentence: Based on GIS, our estimate of the total length of the haul road is approximately 1.3 miles (6,907 feet) with about 0.4 miles (1,923 feet) on BLM managed land. Is this estimate accurate? Also, how wide will this road need to be to accommodate the haul truck traffic? Attached is an aerial photo of the mine with an overlay of the land status, and BLM's estimated location of the proposed haul road.
- First paragraph: Show the waterline and location of the water tank on the maps as points of reference.
- Second paragraph, last sentence: Will this acid-neutralizing waste rock come from the Centennial Pit or the GTO pit? Lisbon Valley will need to provide documentation that the waste rock that will be used as fill will be acid-neutralizing.
- In reference to the list of reasons why this proposal is both a technically and environmentally sound alternative, there is a note that this route would avoid archaeological sites. Provide some reference information on either Map 6A or 6B that show exactly where this route will be located so that the BLM can make that determination.

Attachment 1

- Figures 6A GTO Road Revision and 6B GTO Haul Road Revision: The maps you have provided are not adequate to make an assessment of what Lisbon Valley Copper is going to do. Please provide a scale, survey stationing of the proposed construction, north arrow, land status, and identify whether the blackened areas along the haul road road define the limits of fill placement, or road cut. What is the contour interval of the map?

- Primary Crusher Reclamation Fill Maps: Please add the length width and depth of the area that will be reclaimed, or add a scale and contour interval, so that the dimensions of the reclamation can be determined and defined for environmental analysis.

Once the mine plan modification is complete, the BLM will begin an environmental analysis and make the mine plan modification available for a 30-day public review and comment period per (43 CFR 3809.432 (a)).

Thank you for taking the time to respond to our request for more information. If you have any questions, please contact Rebecca Doolittle at (435) 259-2141.

Sincerely,

/s/ Jeffrey R. Smith





Field Manager

Enclosure
Aerial Photo with Land Status

cc: Tom Munson, UDOGM (w/enclosure)
RDoolittle:mm:1/20/11

Aerial Photo of the Lisbon Valley Copper Mine with Land Status

Legend

-  Bureau of Land Management (BLM)
-  State
-  Private
-  Estimated Location of Proposed Haul Road

1 inch = 2,000 feet

NAIP-2006 San Juan (North)

